



COUNT 2

(Smuggling Goods from the United States, 18 U.S.C. §§ 554 and 2)

The Grand Jury further charges:

2. On a date between about July 2, 2019, and about August 1, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States the following firearms:

- Mossberg rifle, model Flex MVP, 5.56mm, serial # MVP0016856;
- Henry rifle, model US Survival, .22 caliber, serial #US022545C;
- Henry rifle, model Frontier, .22 caliber, serial #T02469SPR;
- Smith and Wesson rifle, model M&P15-22, .22 caliber, serial #DFN5650;
- Remington shotgun, model 870 Express, 12ga, serial #CC50201C ;
- CZ rifle, model 457 Varmint, .22 caliber, serial #C833089;
- Smith and Wesson rifle, model M&P15, 5.56mm, serial #TF61349; and
- Beretta shotgun, model Pintail, 12ga, serial #E01457-97.

contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT 3

(Smuggling Goods from the United States, 18 U.S.C. §§ 554 and 2)

The Grand Jury further charges:

3. On a date between about September 19, 2019, and about October 11, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States the following firearms:

- Ruger rifle, model Precision, .22 caliber, serial #840-86283;
- Ruger rifle, model 10/22 TD, .22 caliber, serial #0014-48073;
- Ruger rifle, model American, .22 caliber, serial #834-60324;
- Smith and Wesson rifle, model M&P15-22, .22 caliber, serial #DFN3649;

- Henry rifle, model US Survival, .22 caliber, serial #US04864VW; and
- Henry rifle, model US Survival, .22 caliber, serial #US04851VW.

contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT 4

(Smuggling Goods from the United States, 18 U.S.C. §§ 554 and 2)

The Grand Jury further charges:

4. On a date between about October 15, 2019, and about October 31, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States the following firearms:

- Henry rifle, model Golden Boy Silver, .22 caliber, serial #SB024032;
- Henry rifle, model Golden Boy Silver, .22 caliber, serial #SB024035;
- CZ rifle, model 457 Varmint, .22 caliber, serial # D033628; and
- Anschutz rifle, model 1710, .22 caliber, serial #3178836.

contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT 5

(Smuggling Goods from the United States, 18 U.S.C. §§ 554 and 2)

The Grand Jury further charges:

5. On a date between about November 1, 2019, and about November 25, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States the following firearms:

- Glock pistol, model G19, 9mm caliber, serial #BHNS427;
- Glock pistol, model G17, 9mm caliber, serial #BGTY051;
- Tikka rifle, model T3X CTR, 6.5mm, serial #N66852;
- Glock pistol, model G26, 9mm caliber, serial #AEAY493;
- Glock pistol, model 17, 9mm caliber, serial #BMKX272;
- Glock pistol, model 17, 9mm caliber, serial #BMKX273;
- Glock pistol, model 19, 9mm caliber, serial #BMFU566;
- Glock pistol, model 19, 9mm caliber, serial #BMFU567;
- Glock pistol, model 17, 9mm caliber, serial #BLKT232;
- Glock pistol, model 17, 9mm caliber, serial #BLKT369;
- Glock pistol, model 19, 9mm caliber, serial #BHHK441;
- Glock pistol, model G48, 9mm caliber, serial #BKND103;
- Glock pistol, model G48, 9mm caliber, serial #BLUZ208;
- DPMS rifle, model LR05PS, serial #FFH246328;
- Smith and Wesson rifle, model M&P-15, serial #TK25272; and
- Ruger rifle, model American Ranch, 7.62mm, serial #690299010.

contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT 6

(Smuggling Goods from the United States, 18 U.S.C. §§ 554 and 2)

The Grand Jury further charges:

6. On a date between about January 21, 2020, and about March 30, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States the following firearms:

- Beretta pistol, model 81, .32 caliber, serial #D69335W;
- Glock pistol, model 43X, 9mm, serial #BMRA008;
- Glock pistol, model 43X, 9mm, serial #BMRA009;
- Glock pistol, model 26, 9mm, serial #AEAY498;
- Glock pistol, model 26, 9mm, serial #ADYH112;
- Beretta pistol, model Tomcat, .32 caliber, serial #DAA575928;
- Beretta pistol, model Tomcat, .32 caliber, serial #DAA575935;

- Taurus revolver, model 627, .357 caliber, serial #MW613922;
- Taurus revolver, model 692 Tracker, .357 caliber, serial #MR567561;
- Beretta pistol, model APX, 9mm, serial #A060931X;
- Beretta pistol, model PX4 Storm, 9mm, serial #PX370047;
- Beretta pistol, model 92FS, 9mm, serial #BER001652;
- Glock pistol, model 19, 9mm, serial #BLXK846;
- Glock pistol, model 19, 9mm, serial #BLXK847;
- Glock pistol, model 19, 9mm, serial #BLXK848;
- CZ rifle, model 550 bolt, .458 caliber, serial #D008573; and
- Beretta pistol, model 81, .32 caliber, serial #D49705W.

contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT 7

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

7. On a date between about June 6, 2019, and about July 2, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, a Anschutz rifle, model 1710, .22 caliber, serial 3176894; and a Ruger rifle, model Precision 22, .22 caliber, serial #840-34271, each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

COUNT 8

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

8. On a date between about July 2, 2019, and about August 1, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, the following firearms:

- Mossberg rifle, model Flex MVP, 5.56mm, serial # MVP0016856;
- Henry rifle, model US Survival, .22 caliber, serial #US022545C;
- Henry rifle, model Frontier, .22 caliber, serial #T02469SPR;
- Smith and Wesson rifle, model M&P15-22, .22 caliber, serial #DFN5650;
- Remington shotgun, model 870 Express, 12ga, serial #CC50201C;
- CZ rifle, model 457 Varmint, .22 caliber, serial #C833089;
- Smith and Wesson rifle, model M&P15, 5.56mm, serial #TF61349; and
- Beretta shotgun, model Pintail, 12ga, serial #E01457-97.

each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

COUNT 9

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

9. On a date between about September 19, 2019, and about October 11, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, the following firearms:

- Ruger rifle, model Precision, .22 caliber, serial #840-86283;
- Ruger rifle, model 10/22 TD, .22 caliber, serial #0014-48073;
- Ruger rifle, model American, .22 caliber, serial #834-60324;
- Smith and Wesson rifle, model M&P15-22, .22 caliber, serial #DFN3649;
- Henry rifle, model US Survival, .22 caliber, serial #US04864VW; and
- Henry rifle, model US Survival, .22 caliber, serial #US04851VW.

each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

COUNT 10

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

10. On a date between about October 15, 2019, and about October 31, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, the following firearms:

- Henry rifle, model Golden Boy Silver, .22 caliber, serial #SB024032;
- Henry rifle, model Golden Boy Silver, .22 caliber, serial #SB024035;
- CZ rifle, model 457 Varmint, .22 caliber, serial #D033628; and
- Anschutz rifle, model 1710, .22 caliber, serial #3178836.

each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.



COUNT 11

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

11. On a date between about November 1, 2019, and about November 25, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, the following firearms:

- Glock pistol, model G19, 9mm caliber, serial #BHNS427;
- Glock pistol, model G17, 9mm caliber, serial #BGTY051;
- Tikka rifle, model T3X CTR, 6.5mm, serial #N66852;
- Glock pistol, model G26, 9mm caliber, serial #AEAY493;
- Glock pistol, model 17, 9mm caliber, serial #BMKX272;
- Glock pistol, model 17, 9mm caliber, serial #BMKX273;
- Glock pistol, model 19, 9mm caliber, serial #BMFU566;
- Glock pistol, model 19, 9mm caliber, serial #BMFU567;
- Glock pistol, model 17, 9mm caliber, serial #BLKT232;
- Glock pistol, model 17, 9mm caliber, serial #BLKT369;
- Glock pistol, model 19, 9mm caliber, serial #BHHK441;
- Glock pistol, model G48, 9mm caliber, serial #BKND103;
- Glock pistol, model G48, 9mm caliber, serial #BLUZ208;
- DPMS rifle, model LR05PS, serial #FFH246328;
- Smith and Wesson rifle, model M&P-15, serial #TK25272; and
- Ruger rifle, model American Ranch, 7.62mm, serial #690299010.

each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.



COUNT 12

(Control of Arms Exports and Imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 18 U.S.C. § 2)

The Grand Jury further charges:

12. On a date between about January 21, 2020, and about March 30, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant KOFFI ANDREA VERSAINT TAREGUE knowingly and willfully exported and caused to be exported from the United States to Ivory Coast, defense articles, to wit, the following firearms:

- Beretta pistol, model 81, .32 caliber, serial #D69335W;
- Glock pistol, model 43X, 9mm, serial #BMRA008;
- Glock pistol, model 43X, 9mm, serial #BMRA009;
- Glock pistol, model 26, 9mm, serial #AEAY498;
- Glock pistol, model 26, 9mm, serial #ADYH112;
- Beretta pistol, model Tomcat, .32 caliber, serial #DAA575928;
- Beretta pistol, model Tomcat, .32 caliber, serial #DAA575935;
- Taurus revolver, model 627, .357 caliber, serial #MW613922;
- Taurus revolver, model 692 Tracker, .357 caliber, serial #MR567561;
- Beretta pistol, model APX, 9mm, serial #A060931X;
- Beretta pistol, model PX4 Storm, 9mm, serial #PX370047;
- Beretta pistol, model 92FS, 9mm, serial #BER001652;
- Glock pistol, model 19, 9mm, serial #BLXK846;
- Glock pistol, model 19, 9mm, serial #BLXK847;
- Glock pistol, model 19, 9mm, serial #BLXK848;
- CZ rifle, model 550 bolt, .458 caliber, serial #D008573; and
- Beretta pistol, model 81, .32 caliber, serial #D49705W.

each that was designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

COUNT 13

(Unlicensed Dealing in Firearms, 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D))

The Grand Jury further charges:

13. From on or about June 5, 2019, through on or about October 19, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, KOFFI ANDREA VERSAINT TAREGUE, not being a licensed importer, licensed manufacturer, or licensed dealer, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT 14

(False Statement, 18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

14. On or about April 4, 2020, in the Northern District of Ohio, Defendant KOFFI ANDREA VERSAINT TAREGUE did willfully and knowingly make a materially false statement in a matter within the jurisdiction of the executive branch of the Government of United States, by falsely stating to agents of the Federal Bureau of Investigation that he purchased the firearms detailed in Counts 1-12 as gifts, when, in fact, he had purchased these firearms for another individual who sent funds to the Defendant, in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 15

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

15. On or about June 12, 2019, in the Northern District of Ohio, Defendant KOFFI ANDREA VERSAINT TAREGUE, in connection with the acquisition of a firearm, an Anschutz 1710 rifle, Serial Number 3176894, from Mayfield Gun, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious

written statement to Mayfield Gun as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that Defendant KOFFI ANDREA VERSAINT TAREGUE did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearm indicated on the Form 4473, which was false, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

16. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C), Title 22, United States Code, Section 401, and Title 28 United States Code, Section 2461(c), the allegations of Counts 1 through 13, and 15, are incorporated herein by reference. As a result of the foregoing offenses, Defendant KOFFI ANDREA VERSAINT TAREGUE shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; any and all arms or munitions of war; and all firearms and ammunition, involved in or used in the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.